

Bob Jahelka, CPA
Demasco Sena & Jahelka, LLP
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(516) 541-6549

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In re:

Chapter 7

BMT DESIGNERS & PLANNERS, INC.,
fdba BMT D&P, fdba BMT fdba BMT DAS US,

Case No. 22-10123 (MG)

Debtor.
-----X

ACCOUNTANT'S AFFIDAVIT OF DISINTERESTEDNESS

STATE OF NEW YORK)
) ss:
COUNTY OF NASSAU)

Bob Jahelka, being duly sworn, deposes and says:

1. I am a Certified Public Accountant and Managing Partner of Demasco Sena & Jahelka, LLP ("DSJ"), duly licensed to practice in the state of New York and maintains an office at 1400 Old Country Road #310e, Westbury, NY 11590.

2. I have been practicing in the accounting profession for many years and I am well versed and experienced in the review of books and records of debtors in insolvency matters.

3. DSJ is a Long Island based accounting firm with subject matter expertise in forensic accounting, litigation support, and expert witness testimony services. DSJ has performed forensic investigations and litigation support in multiple industries, including SEC matters, financial services, food & beverage, and others. In addition, multiple members of DSJ have experience with government contract work, including the Deltek software used by the Debtor. I have previously

served as a trustee for matters that LH&M has served as counsel on and I currently serve as a testifying expert witness in four ongoing forensic cases, including two bankruptcy matters.

4. DSJ has a long-standing working relationship the Trustee's general counsel, LH&M, including ongoing matters (in addition to this matter) with two other Partners at LHM. DSJ has worked specifically with both LH&M and the Trustee in the past on bankruptcy matters, allowing us to leverage our knowledge of LH&M's case strategy and work product to work collaboratively and efficiently. Additionally, DSJ has historically had a lower blended rate in past bankruptcy cases, allowing funds to be primarily used to return to the creditors.

5. After review of the Debtor's petition, schedules, statement of financial affairs, creditor matrix, the docket and any notices of appearance that have been filed in this case, it has been determined that DSJ is not connected with any such parties. Annexed this to this Declaration as Exhibit "A", is a list provided to DSJ by Salvatore LaMonica's (the "Trustee") general counsel, LaMonica Herbst & Maniscalco, LLP, comprising of the Trustee, Debtor, the Debtor's creditors, any other party in interest, their respective attorneys and accountants, the United States Trustee or any person employed in the office of the United States Trustee, Judge Martin Glenn or any of the Judge's staff members.

6. After review of Exhibit "A" and to the best of my knowledge, it has been determined that DSJ is not connected to the Trustee, the Debtor, the Debtor's creditors, any other party in interest, their respective attorneys and accountants, the United States Trustee or any person employed in the office of the United States Trustee, Judge Martin Glenn or any of the Judge's staff members. To the extent any information disclosed herein requires the subsequent amendment or modification of this declaration upon DSJ's completion of further review and analysis or as

additional party-in-interest information becomes available to it, a supplemental affidavit disclosing such information will be filed with the Court reflecting such amended or modified information.

7. DSJ is disinterested as that term is defined in 11 U.S.C. Section 101(14) (“Bankruptcy Code”).

8. Neither DSJ nor any member of DSJ has any claims against the Debtor.

9. DSJ proposes to render the following services:

- i. Preparing the tax returns, forms and reports required to be filed by the Debtor including, but not limited to, Federal and multiple state income tax returns, complying with foreign reporting requirements, sales and use tax returns, employment tax returns and other local personal property tax returns;
- ii. Reviewing previously filed Federal, state and local income tax returns;
- iii. Perform the requisite accounting services in connection with the collection of the Debtor’s accounts receivable, including, but not limited to, performing true-ups of the outstanding amounts owed, any potential offsets and the amounts collected;
- iv. Reviewing and analyzing tax issues as they may arise; and
- v. Reviewing notice received from the Internal Revenue Service and other state or local tax authorities; and
- vi. Performing such other accounting services as the Trustee may deem necessary herein.

10. The amount of fees and expenses incurred by DSJ will depend on the extent the Trustee requires DSJ’s assistance.

11. Subject to a hearing, DSJ will request payment upon appropriate application to the Court in accordance with Bankruptcy Code sections 330 and 331 and the applicable Bankruptcy Rules and Local Bankruptcy Rules of this Court. Pursuant to Bankruptcy Code section 330(a)(1)(A), the Court may award reasonable compensation for actual and necessary expenses and services rendered in conjunction with the Debtor’s case.

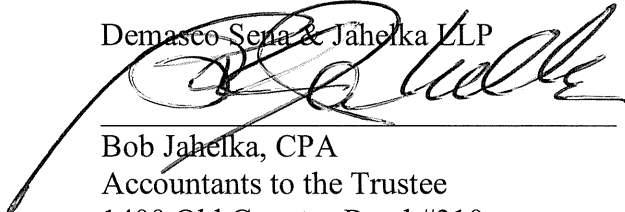
12. Our current hourly billing rates:

Partner	\$ 355
Manager	\$ 310
Supervisor	\$ 265
Senior Associate	\$ 235
Associate	\$ 220
Bookkeeper	\$ 160
Support Staff	\$ 140

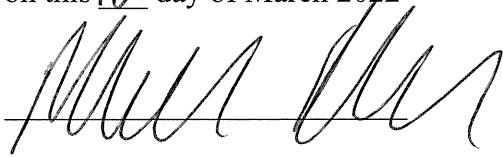
13. DSJ revises its rates January 1 of each year.
14. Ten business days prior to any increases in DSJ's rates, for any individual employed by DSJ and retained by the Trustee providing services in this case, DSJ shall file a supplemental affidavit with the Court setting forth the basis for the requested rate increase pursuant to Bankruptcy Code section 330(a)(3)(F).
15. No payments have been made to DSJ for services rendered, or to be rendered, in connection with the Debtor's case. DSJ has not received a retainer.
16. Subject to the approval of this Court, the source of all compensation for professional services to be rendered on behalf of the Trustee shall be funds of the Debtor's estate.
17. No agreement exists between DSJ and any other party for the sharing of compensation to be received by DSJ in connection with services rendered in this case.

WHEREFORE, DSJ respectfully requests that the Court enter an Order authorizing and approving the retention of DSJ as accountants to the Trustee and for such other and further relief as the Court deems just.

Demasco Sena & Jahelka LLP


Bob Jahelka, CPA
Accountants to the Trustee
1400 Old Country Road #310e
Westbury, NY 11590
(516) 541-6549

Sworn and subscribed to before me
on this 18 day of March 2022



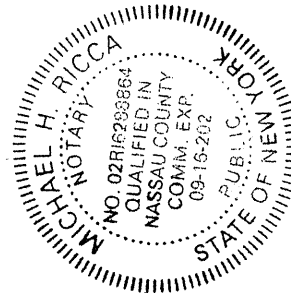


EXHIBIT A

Chapter 7 Trustee

Salvatore LaMonica

Chambers

Honorable Chief Judge Martin Glenn

Courtroom Deputy: Deanna Anderson

Law Clerks:

Andres Barajas

Michael Blackmon

Annie Ziesing

Office of the United States Trustee

William K. Harrington

Linda A. Rifkin

Victor Abriano

Susan Arbeit

Mark Bruh

Maria Catapano

Shara Cornell

James Gannone

Benjamin J. Higgins

Joseph Nadkarni

Brian S. Masumoto

Ercilia A. Mendoza

Mary V. Moroney

Richard C. Morrissey

Alaba Ogunleye

Ilusion Rodriguez

Andrea B. Schwartz

Paul K. Schwartzberg

Shannon Scott

Sylvester Sharp

Tara Tiantian

Andy Velez-Rivera

Madeleine Vescovacci

Annie Wells

Greg M. Zipes

Debtor

BMT Designers & Planners, Inc.

Debtor's Counsel

Bennett S. Silverberg, Esq.

Brown Rudnick LLP

Debtor's Officers, directors managing members, general partners, members in control, controlling shareholders, or other people in control of the Debtor:

Ricky Cox, President of the Debtor

David Bardash, VP, Commercial

Paul Schneider, Proxy Holder, Board Chairman

Rita Chaundy, VP, Finance

Technology Financing Inc, Parent Company

Former officers, directors managing members, general partners, members in control, shareholders, or other people in control of the Debtor:

Albert Graves VP, Finance

Doug Donegan VP, Operations

James Hull Proxy Holder, Outside Board Member

John Hollingsworth VP, Engineering

Kai Skvarla, President

Mike Rigas, President

Mitch Waldman, Proxy Holder, Outside Board Member

Richard Celotto, VP, Compliance Advisory Services

Robert Corey, VP, Engineering

Thomas F. Atkin, Proxy Holder, Outside Board Member

Attorneys for creditors

Michael J. Gearin, Esq.

K&L GATES

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**SPEEGLE, HOFFMAN, HOLMAN
& HOLIFIELD, LLC**

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Green Bay, WI 54301-4298

Attorneys for Fincantieri Marine Group

Debtor's Accountants/bookkeepers/Auditors

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Lin Yang

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Mary Karen Wills

c/o BRG

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Rita Chaundy

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Other possible parties in interest pursuant to the Debtor's SOFA

Tenco Capital LLC

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New York, NY 10017

Prime Clerk LLC
55 E 52nd Street
17th Floor
New York, NY 10055

Other business/connections to the Debtor pursuant to the Debtor's SOFA

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Columbia, MD 21045

Creditors of the Debtor's estate

Austal Usa, Llc
C/O Jerome E. Speegle, Esq.
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Amentum Services Inc
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